

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)

This document relates to:

Hemenway et al. v. Islamic Republic of Iran, 18-cv-12277 (GBD) (SN)

Kim et al. v. Islamic Republic of Iran, 18-cv-11870 (GBD) (SN)

King et al. v. Islamic Republic of Iran, 22-cv-05193 (GBD) (SN)

**MOVING PLAINTIFFS' NOTICE OF MOTION FOR PARTIAL FINAL DAMAGES
JUDGMENTS**

PLEASE TAKE NOTICE that upon the supporting Memorandum of Law and the Declaration of Jerry S. Goldman, Esq. (“Goldman Declaration”) and exhibits annexed thereto, and the exhibits submitted with access restricted to the Court pursuant to the May 5, 2022 Order, ECF No. 7963, pertaining to expert reports submitted in support of default judgments, certain of the plaintiffs in the above-captioned matters who are identified in Exhibit A annexed to the Goldman Declaration (which is Exhibit B to the Proposed Order) (“Moving Plaintiffs”), by and through their counsel, Anderson Kill P.C., respectfully move this Court for an ORDER:

- (1) Awarding the Moving Plaintiffs damages judgments against the Islamic Republic of Iran (“Iran”); AND,
- (2) awarding the estates of the 9/11 decedents, through the personal representatives and on behalf of all survivors and all legally entitled beneficiaries and family member of such 9/11 decedents, as set forth in Exhibit A, compensatory damages for pain and suffering in the same per estate amount previously awarded by this Court regarding other estates of decedents killed in the September 11th attacks, as set forth in Exhibit A; AND,

(3) awarding compensatory damages to certain Moving Plaintiffs identified in Exhibit A for decedents' pain and suffering in an amount of \$2,000,000 per estate, as set forth in annexed Exhibit A; AND,

(4) awarding the estates of the 9/11 decedents, through their personal representatives and on behalf of all survivors and all legally entitled beneficiaries and family members of such 9/11 decedent, as identified in Exhibit A, an award of economic damages in the amounts set forth in Exhibit A; AND,

(5) awarding the Moving Plaintiffs identified in Exhibit A prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the damages judgment; AND,

(6) granting the Moving Plaintiffs identified in Exhibit A permission to seek punitive damages, economic damages, and other appropriate damages, at a later date, to the extent such awards have not previously been addressed; AND,

(7) granting permission for all other Plaintiffs in these actions not appearing in Exhibit A to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; AND,

(8) granting to the Moving Plaintiffs in Exhibit A such other and further relief as this Honorable Court deems just and proper.

Plaintiffs' request is made in connection with the judgments on default as to liability entered against Iran as set forth in Exhibit A to the Proposed Order.

Dated: New York, New York
June 17, 2024

Respectfully submitted,

/s/ Jerry S. Goldman

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